

REDACTED
COPY

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SA-20-CR-543-OLG

NOV 18 2020

CLERK OF DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

[REDACTED]
FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carita" (3),
VICENTE RIVERA CENICEROS (4),
GUILLERMO BERMUDEZ OLIVARES (5),
[REDACTED]

RAFAEL PALACIOS SANCHEZ (7),
HERIBERTO DE LA GARZA SAUCEDO (8),
[REDACTED]

SALVADOR ELI LOZANO ALVARADO
(10),
JOSE LUIS NAJERA, also known as "Chepc"
(11),
[REDACTED]

SERGIO IVAN CUELLAR, also known as
"Checo" (13),
GERARDO SOTO GOMEZ (14),
And
HOMERO DE LA GARZA (15),

Defendants.

COUNT I: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1)(A) - Conspiracy
to Possess with intent to Distribute
(Methamphetamine)

COUNT II: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1)(A) - Conspiracy
to Possess with intent to Distribute
(Cocaine)

COUNT III: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1)(A) - Conspiracy
to Possess with intent to Distribute
(Heroin)

COUNT IV: Title 21, U.S.C. §§
841(a)(1) & 841(b)(1)(c), 18 U.S.C. § 2 -
Possession with intent to Distribute
(Cocaine), and Aiding and Abetting

COUNT V: Title 21, U.S.C. §§
841(a)(1) & 841(b)(1)(A) - Possession
with intent to Distribute
(Methamphetamine)

COUNT VI: Title 21, U.S.C. §§
841(a)(1) & 841(b)(1)(A) - Possession
with intent to Distribute
(Methamphetamine)

COUNT VII: Title 21, U.S.C. §§
841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2
- Possession with intent to Distribute
(Methamphetamine), and Aiding and
Abetting

COUNT VIII: Title 21, U.S.C. §§
841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2
- Possession with intent to Distribute
(Methamphetamine), and Aiding and
Abetting

COUNT IX: Title 21, U.S.C. §§ 846,
841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2
- Attempted Possession with intent to
Distribute (Cocaine), and Aiding and
Abetting

COUNT X: Title 21, U.S.C. §§ 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2 - Possession with intent to Distribute (Methamphetamine), and Aiding and Abetting

COUNT XI: Title 21, U.S.C. §§ 846 and 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2 - Attempted Possession with intent to Distribute (Methamphetamine), and Aiding and Abetting

COUNT XII: Title 21, U.S.C. §§ 846 and 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2 - Attempted Possession with intent to Distribute (Heroin), and Aiding and Abetting

COUNT XIII: Title 21, U.S.C. §§ 846 and 841(a)(1) & 841(b)(1)(A), 18 U.S.C. § 2 - Attempted Possession with intent to Distribute (Cocaine), and Aiding and Abetting

COUNT XIV: Title 18 U.S.C. §§ 1956(a)(2)(B)(i) and 1956(h) - Laundering of Monetary Instruments Conspiracy

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)]

Beginning on or about October 2019, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

████████████████████
FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carita" (3),
VICENTE RIVERA CENICEROS (4),
GUILLERMO BERMUDEZ OLIVARES (5),
████████████████████

RAFAEL PALACIOS SANCHEZ (7),
HERIBERTO DE LA GARZA SAUCEDO (8),

JOSE LUIS NAJERA, also known as "Chepe" (11),
[REDACTED]
SERGIO IVAN CUELLAR, also known as "Checo" (13),
and
HOMERO DE LA GARZA (15),

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A). All in violation of Title 21, United States Code, Section 846.

COUNT TWO
[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)]

Beginning on or about October 2019, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

[REDACTED]
FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carita" (3),
VICENTE RIVERA CENICEROS (4),
GUILLERMO BERMUDEZ OLIVARES (5),
[REDACTED]
RAFAEL PALACIOS SANCHEZ (7),
[REDACTED]
SALVADOR ELI LOZANO ALVARADO (10),
JOSE LUIS NAJERA, also known as "Chepe" (11),
[REDACTED]
GERARDO SOTO GOMEZ (14),

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in

violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A). All in violation of Title 21, United States Code, Section 846.

COUNT THREE

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)]

Beginning on or about October 2019, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

**GENARO ORTIZ, also known as "Carita" (3),
and
RAFAEL PALACIOS SANCHEZ (7),**

knowingly and intentionally conspired, combined, confederated, and agreed together, and with each other, and with others, to commit the following offenses against the United States: to distribute a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A). All in violation of Title 21, United States Code, Section 846.

COUNT FOUR

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C) and 18 U.S.C. § 2]

That on or about November 22, 2019, in the Western District of Texas, Defendant,

VICENTE RIVERA CENICEROS (4),

aided and abetted by others, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and 18 U.S.C. § 2.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

That on or about December 6, 2019, in the Western District of Texas, Defendant,

GUILLERMO BERMUDEZ OLIVARES (5),

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT SIX

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

That on or about February 12, 2020, in the Western District of Texas, Defendant,

GUILLERMO BERMUDEZ OLIVARES (5),

did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about March 6, 2020, in the Western District of Texas, Defendants,

**FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carita" (3),
VICENTE RIVERA CENICEROS (4),**

and

JOSE LUIS NAJERA, also known as "Chepe" (11)

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture

or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about March 23, 2020, in the Western District of Texas, Defendants,

**VICENTE RIVERA CENICEROS (4),
SERGIO IVAN CUELLAR, also known as "Checo" (13),
and
HOMERO DE LA GARZA (15),**

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 18 U.S.C. § 2.

COUNT NINE

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about March 30, 2020, in the Western District of Texas, Defendant,


FAUSTINO CAMPOS NAJERA (2),

aided and abetted by others, did knowingly, intentionally and unlawfully attempt to possess with the intent to distribute, a controlled substance, which offense involved 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and 18 U.S.C. § 2. All in violation Title 21, United States Code, Section 846.

COUNT TEN

[21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about April 28, 2020, in the Western District of Texas, Defendants,


FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carits" (3)
HERIBERTO DE LA GARZA SAUCEDO (8)
and
JOSE LUIS NAJERA, also known as "Chepe" (11),

aided and abetted by each other, did knowingly, intentionally and unlawfully possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and 18 U.S.C. § 2.

COUNT ELEVEN

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about June 29, 2020, in the Western District of Texas, Defendant,

GENARO ORTIZ, also known as "Carita" (3),

aided and abetted by others, did knowingly, intentionally and unlawfully attempt to possess with the intent to distribute, a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and 18 U.S.C. § 2. All in violation of Title 21, United States Code, Section 846.

COUNT TWELVE

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about June 29, 2020, in the Western District of Texas, Defendant,

GENARO ORTIZ, also known as "Carita" (3),
aided and abetted by others, did knowingly, intentionally and unlawfully attempt to possess with the intent to distribute, a controlled substance, which offense involved 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and 18 U.S.C. § 2. All in violation of Title 21, United States Code, Section 846.

COUNT THIRTEEN

[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 2]

That on or about June 29, 2020, in the Western District of Texas, Defendant,

GENARO ORTIZ, also known as "Carita" (3),
aided and abetted by others, did knowingly, intentionally and unlawfully attempt to possess with the intent to distribute, a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and 18 U.S.C. § 2. All in violation of Title 21, United States Code, Section 846.

COUNT FOURTEEN

[18 U.S.C. §§ 1956(a)(2)(B)(i) and 1956(h)]

Beginning on or about October 2019, the exact date unknown, and continuing until the date of this indictment, in the Western District of Texas, Defendants,

[REDACTED]
FAUSTINO CAMPOS NAJERA (2),
GENARO ORTIZ, also known as "Carita" (3),
RAFAEL PALACIOS SANCHEZ (7),
HERIBERTO DE LA GARZA SAUCEDO (8),
and
JOSE LUIS NAJERA, also known as "Chepe" (11)

did knowingly conspire with others known and unknown to the Grand Jury to transport, transmit

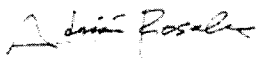
and transfer, and attempt to transport, transmit and transfer monetary instruments and funds from a place in the United States to or through a place outside the United States, knowing that the monetary instrument and funds involved represented the proceeds of a specified unlawful activity, to-wit: drug trafficking violations of Title 21, United States Code, Sections 846 and 841(a)(1), knowing that such transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 1956(h).

A TRUE BILL.



GREGG N. SOFER
UNITED STATES ATTORNEY

BY:



ADRIÁN ROSALES
Assistant United States Attorney